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14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 CAROL WINGFIELD, an Individual,
18 Plaintiff,

19 vs.

20 GREEN KEY SOLUTIONS, LLC, a
21 Foreign Limited Liability Company;
22 HEALTHCARE PARTNERS OF
23 NEVADA, LLC, a Domestic Limited
24 Liability Company; HEALTHCARE
25 PARTNERS MEDICAL GROUP
26 (COATS), LTD., a Domestic Professional
27 Corporation; DAVITA MEDICAL GROUP;
28 DAVITA CLINICAL RESEARCH; DOES I
-X; and ROE CORPORATIONS I -X,

29
30 Defendant.

31 **CASE NO.: 2:19-cv-00815-JCM-NJK**

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33 **MOTION FOR EXTENSION OF TIME**
34 **WITHIN WHICH**
35 **TO SERVE SUMMONS AND**
36 **COMPLAINT**

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38 **(Second Request)**

39 COMES NOW, Plaintiff Carol Wingfield ("Plaintiff"), by and through her attorneys,
40 Jenny L. Foley, Ph.D., Esq. and Marta D. Kurshumova, Esq. of HKM Employment Attorneys
41 LLP, and hereby submits her Motion for Extension of Time Within Which to Serve Summons
42 and Complaint.

43 On May 10, 2019, Plaintiff filed a Complaint with the United States District Court for
44

1 the District of Nevada. Plaintiff did not serve the Summons and Complaint to Defendants due
2 to on-going negotiations. On August 14, 2019, this Court issued a Notice of Intent to Dismiss
3 Plaintiff's Complaint pursuant to FRCP 4(m) unless Proof of Service is filed on September 13,
4 2019. On September 11, 2019, this Court granted Plaintiff's First Motion for Extension of Time
5 Within Which to Serve Summons and Complaint and extended the deadline for service until
6 October 14, 2019.

7 This request is sought in good faith and not for the purpose of delay. The Parties are
8 still currently working on the language of the settlement agreement and wish to avoid the
9 potentially unnecessary time and expense of service of the Summons and Complaint,
10 Defendants' responses to the Complaint, the Parties completion of the FRCP 26(f) Conference,
11 and the Parties exchanging initial disclosures. As such, Plaintiff respectfully requests this
12 Court's approval of a thirty (30)-day extension for Plaintiff to serve the Complaint and
13 Summons to Defendants, which would permit the Parties to exhaust early settlement
14 discussions before incurring further litigation costs.

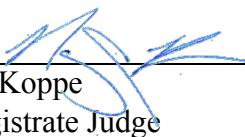
15 Dated this 15th Day of October, 2019.

16 **HKM EMPLOYMENT ATTORNEYS, LLP**

17 /s/ Jenny Foley
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26 IT IS SO ORDERED.

27 DATE: October 16, 2019

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Nancy J. Koppe
U.S. Magistrate Judge